# UNITED STATES BANKRUPTCY COURT DISTRICT OF DELAWARE

In re: Chapter
----------------

Legacy IMBDS, Inc., et al., 1 Case No. 23-10852 (KBO)

Debtors. (Jointly Administered)

Ref. Docket Nos. 529, 537, 547, 562, 593, 626, 639, 677, 714

## NOTICE OF EXTENSION OF THE SYNACOR CHALLENGE PERIOD THROUGH NOVEMBER 22, 2023

PLEASE TAKE NOTICE that, on September 14, 2023, the Court entered the *Order Approving the Stipulation Among the Debtors, the Official Committee of Unsecured Creditors, and Synacor, Inc. Extending the Initial Challenge Period Through September 20, 2023* [Docket No. 529] (the "Stipulation Order").<sup>2</sup>

PLEASE TAKE FURTHER NOTICE that, pursuant to paragraph 3 of the Stipulation Order, the Synacor Challenge Period may be further extended upon the written consent of the Stipulation Parties.

PLEASE TAKE FURTHER NOTICE that the Stipulation Parties have each consented in writing to a further extension of the Synacor Challenge Period from November 15, 2023 to <a href="November 22, 2023">November 22, 2023</a> solely for Challenges (as defined in the Final DIP Order) brought by the Debtors or the Official Committee of Unsecured Creditors with respect to the amount, validity,

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: ValueVision Media Acquisitions, Inc. (8670); Legacy IMBDS, Inc. (3770); ValueVision Interactive, Inc. (8730); Portal Acquisition Company (3403); VVI Fulfillment Center, Inc. (5552); ValueVision Retail Inc. (2155); JWH Acquisition Company (3109); PW Acquisition Company, LLC (0154); EP Properties, LLC (3951); FL Acquisition Company (3026); Norwell Television, LLC (6011); and 867 Grand Avenue, LLC (2642). The Debtors' service address is 6740 Shady Oak Road, Eden Prairie, MN 55344-3433.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used in this Notice but not defined herein shall have the meanings ascribed to them in the Stipulation Order.

enforceability, priority, or extent of the Synacor Promissory Note Obligations, the liens of Synacor on the Pre-Petition Synacor Collateral securing the Synacor Promissory Note Obligations, or any other claims, counterclaims, causes of action, objections, contests, or defenses against Synacor on behalf of the Debtors' Estates.

Dated: November 15, 2023 Wilmington, Delaware

#### PACHULSKI STANG ZIEHL & JONES LLP

#### /s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436) Timothy P. Cairns (DE Bar No. 4228) 919 North Market Street, 17<sup>th</sup> Floor P.O. Box 8705

Wilmington, Delaware 19899-8705 (Courier 19801)

Telephone: 302-652-4100 Facsimile: 302-652-4400 Email: ljones@pszjlaw.com tcairns@pszjlaw.com

-and-

#### **ROPES & GRAY LLP**

Ryan Preston Dahl (admitted pro hac vice)
Cristine Pirro Schwarzman (admitted pro hac vice)
1211 Avenue of the Americas
New York, New York 10036
Telephone: (212) 596-9000
Facsimile: (212) 596-9090

E-mail: ryan.dahl@ropesgray.com

cristine.schwarzman@ropesgray.com

-and-

### **ROPES & GRAY LLP**

Stephen L. Iacovo (admitted pro hac vice) 191 North Wacker Drive, 32<sup>nd</sup> Floor Chicago, Illinois 60606 Telephone: (312) 845-1200

Facsimile: (312) 845-5500

E-mail: stephen.iacovo@ropesgray.com

Counsel to the Debtors and Debtors in Possession